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8 nortons@gtlaw.com  
*Counsel for Plaintiffs*

9  
10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 HAKKASAN LV, LLC,  
a Nevada limited liability company,  
13 HAKKASAN LIMITED,  
a foreign private limited company,

14 Plaintiffs,

15 v.

16 EZ LEASE PROPERTY  
MANAGEMENT, LLC, also known as  
17 EZ LEASE PROPERTY, S,  
a Nevada limited liability company,  
18

19 Defendant.

Case No.: 2:14-cv-00798-APG-GWF

**PLAINTIFFS' MOTION TO STRIKE  
DEFENDANT'S MOTION TO SET  
ASIDE DEFAULT AND DEFAULT  
JUDGMENT, REQUEST FOR  
EVIDENTIARY HEARING  
REGARDING SERVICE, AND  
MOTION FOR STAY OF EXECUTION  
OF JUDGMENT**

20  
21 Plaintiffs Hakkasan Limited and Hakkasan LV, LLC ("Plaintiffs") by and through their  
22 counsel of record, the law firm of Greenberg Traurig, LLP, hereby submit this Motion to Strike  
23 Defendant EZ Lease Property Management, LLC, also known as EZ Lease Property,  
24 ("Defendant") Motion to Set Aside Default and Default Judgment, Request for Evidentiary Hearing  
25 Regarding Service, and Motion for Stay of Execution of Judgment filed on December 18, 2014, in  
26 the above-captioned case.

27 This Motion is made and based on the following memorandum of points and authorities, the  
28 Declaration of Lauri S. Thompson, Esq., the pleadings and papers on file with the Court, and any

oral argument of counsel the Court may entertain at a hearing on the Motion.

## MEMORANDUM OF POINTS AND AUTHORITIES

### I. PROCEDURAL HISTORY

This case involves Defendant's violations of the Anti-Cybersquatting Consumer Protection Act, trademark infringement, unfair competition, deceptive trade practices, and intentional interference with prospective economic advantage. After several unsuccessful pre-litigation attempts to discuss this matter with Defendant, and during which Plaintiffs' counsel urged Defendant to retain counsel, Plaintiffs were forced to file their Complaint on May 20, 2014.<sup>1</sup> Defendant failed to file an answer or otherwise defend this case, despite having full knowledge of the lawsuit,<sup>2</sup> and Plaintiffs obtained a default judgment against Defendant on or about July 23, 2014. See Dkt. # 22.

On December 11, 2014, Plaintiffs obtained an Order from the Court setting the judgment debtor examination of Defendant's person most knowledgeable. See Dkt. # 26. Plaintiffs emailed Defendant a courtesy copy of the Order and received an immediate response from Dale/Keith Crawford,<sup>3</sup> the owner of Defendant.<sup>4</sup> Plaintiffs' counsel briefly corresponded with Mr. Crawford, and again advised Mr. Crawford to retain counsel.<sup>5</sup> Mr. Crawford implied that he was indeed

---

<sup>1</sup> See Declaration of Lauri S. Thompson, Esq. ("Thompson Decl."), attached hereto as **Exhibit 1**; see also Demand letter to Defendant dated April 30, 2014, attached to the Thompson Decl. as **Exhibit 1-A** and Email response from Defendant dated May 10, 2014 acknowledging ownership of the domain names and offering to sell them to Plaintiffs for \$2,000,000, attached to the Thompson Decl. as **Exhibit 1-B**; see also Email from Lauri Thompson to Keith Crawford dated May 14, 2014, attached to the Thompson Decl. as **Exhibit 1-C**.

<sup>2</sup> See Email from Cynthia Ney to Defendant dated May 27, 2014, attached hereto as **Exhibit 1-D**; see also Emails received from Keith Crawford in response to receiving copies of Complaint and Motion for Temporary Restraining Order and Preliminary Injunction dated May 27, 2014 and May 28, 2014, attached to Thompson Decl. as **Exhibits 1-E** and **1-F**, respectively.

<sup>3</sup> The Nevada Secretary of State website identifies Keith Crawford as the "Registered Agent" of the Defendant, and Dale Crawford as the "Manager," however, Plaintiffs have reason to believe that Keith and Dale Crawford are the same person. Nonetheless, when Plaintiffs' counsel spoke to Mr. Crawford on the telephone in May 2014, prior to filing the lawsuit, Plaintiffs' counsel was informed she was speaking with Keith Crawford. See Thompson Decl. at ¶ 5.

<sup>4</sup> See Email from Cynthia Ney to Defendant regarding Order setting the Judgment Debtor Examination of the Person Most Knowledgeable of Defendant, attached to the Thompson Decl. as **Exhibit 1-G**; see also Email from Mr. Crawford in response to service of Order Setting Judgment Debtor Examination of Person Most Knowledgeable of Defendant, dated December 11, 2014, attached to the Thompson Decl. as **Exhibit 1-H**.

<sup>5</sup> See Email from Shauna Norton, Esq. to Mr. Crawford, dated December 15, 2014, attached to the Thompson Decl. as **Exhibit 1-I**.

1 retaining legal counsel and would have him or her contact Plaintiffs' counsel.<sup>6</sup> Plaintiffs' counsel  
 2 did not hear from any such attorney, and instead, received another harassing and threatening email  
 3 from Mr. Crawford on December 16, 2014.<sup>7</sup> The following day, Mr. Crawford, on behalf of  
 4 Defendant, filed the Motion to Set Aside Default and Default Judgment, Request for Evidentiary  
 5 Hearing, and Motion for Stay of Execution. However, a non-lawyer may not represent a  
 6 corporation or other fictional entity in court. Accordingly, Plaintiff respectfully requests that this  
 7 court strike Defendant's answer in its entirety.

## 8 **II. LEGAL ARGUMENT**

9 "It has been the law for the better part of two centuries...that a corporation may appear in  
 10 the federal courts only through licensed counsel." Rowland v. California Men's Colony, 506 U.S.  
 11 194, 202 (1993); see also United States v. Unimex, 991 F.2d 546, 549 (9th Cir. 1993) ("Counsel is  
 12 essential for a corporation at trial, because it cannot appear pro se); Eagle Financial Service, CO v.  
 13 C.I.P. Venture Group, LLC, 2007 WL 1430060 at \*1 ("Nonattorneys are barred from representing  
 14 corporations."). The primary reason for this requirement is "that the conduct of litigation by a non-  
 15 lawyer creates unusual burdens not only for the party he represents but as well for his adversaries in  
 16 court." Sunde v. Contel of California, 112 Nev. 541, 543 (1996). Further, non-lawyers "frequently  
 17 bring pleadings that are awkwardly drafted, motions that are inarticulately presented [and]  
 18 proceedings that are needlessly multiplicative." Id. Additionally, non-lawyers lack the professional  
 19 skills of a lawyer as well as "many of the attorney's ethical responsibilities, e.g. to avoid litigating  
 20 unfounded or vexatious claims." Id.

21 Here, Mr. Crawford, a non-lawyer, has filed a Motion with this Court on behalf of  
 22 Defendant, a Nevada limited liability company. Since an entity must be represented by licensed  
 23 counsel, Mr. Crawford's representation of Defendant is prohibited as a matter of law. As such, this  
 24 court should strike Defendant's Motion to Set Aside Default and Default Judgment, Request for  
 25 Evidentiary Hearing Regarding Service, and Motion for Stay of Execution of Judgment in its  
 26

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27 <sup>6</sup> See Multiple emails from Mr. Crawford, dated December 15, 2014, wherein he claims he has retained legal counsel,  
 28 attached to the Thompson Decl. as **Exhibit 1-J** and **1-K**.

<sup>7</sup> See Email from Mr. Crawford dated December 16, 2014, attached to the Thompson Decl. as **Exhibit 1-L**.

entirety.

**III. CONCLUSION**

Based on the foregoing, Plaintiffs respectfully request that the Court grant their motion to strike the Motion filed by Defendant EZ Lease Property Management, LLC, a/k/a EZ Lease Propertys.

Dated this 19<sup>th</sup> day of December, 2014.

GREENBERG TRAURIG, LLP

/s/ Laraine M.I. Burrell

Lauri S. Thompson (Bar No. 6846)

Laraine M.I. Burrell (Bar No. 8771)

Shauna L. Norton (Bar No. 11320)

3773 Howard Hughes Parkway, Suite 400 N

Las Vegas, Nevada 89169

*Counsel for Plaintiffs*

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3773 Howard Hughes Parkway  
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Telephone: (702) 792-3773  
Facsimile: (702) 792-9002

**CERTIFICATE OF SERVICE**

I hereby certify that on December 19, 2014, I served the foregoing **PLAINTIFFS' MOTION TO STRIKE DEFENDANT'S MOTION TO SET ASIDE DEFAULT AND DEFAULT JUDGMENT, REQUEST FOR EVIDENTIARY HEARING REGARDING SERVICE, AND MOTION FOR STAY OF EXECUTION OF JUDGMENT** on:

EZ Lease Property Management, LLC aka  
EZ Lease Propertys  
c/o Dale/Keith Crawford  
848 N. Rainbow Blvd. #A69  
Las Vegas, NV 89107  
*Defendant*

by causing a full, true, and correct copy thereof to be sent by the following indicated method or methods, on the date set forth below:

X by mailing in a sealed, first-class postage-prepaid envelope, addressed to the last-known office address of the attorney, and deposited with the United States Postal Service at Las Vegas, Nevada.

/s/ Cynthia L. Ney  
An employee of Greenberg Traurig, LLP

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LAURI S. THOMPSON, ESQ.  
Nevada Bar No. 6846  
LARAIN BURRELL, ESQ.  
Nevada Bar No. 8771  
SHAUNA L. NORTON, ESQ.  
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*Counsel for Plaintiffs*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

HAKKASAN LV, LLC, a Nevada  
limited liability company,  
HAKKASAN LIMITED, a foreign  
private limited company,

Plaintiffs,

v.

EZ LEASE PROPERTY  
MANAGEMENT, LLC, also known as  
EZ LEASE PROPERTY, a Nevada  
limited liability company,

Defendant.

Case No.: 2:14-cv-00798-APG-GWF

**DECLARATION OF LAURI S.  
THOMPSON, ESQ. IN SUPPORT OF  
PLAINTIFFS' MOTION TO STRIKE  
DEFENDANT'S MOTION TO SET ASIDE  
DEFAULT AND DEFAULT JUDGMENT,  
REQUEST FOR EVIDENTIARY  
HEARING REGARDING SERVICE, AND  
MOTION FOR STAY OF EXECUTION OF  
JUDGMENT**

I, LAURI S. THOMPSON, ESQ., declare under penalty of perjury under the laws of the United States that the facts contained herein are of my personal knowledge, and if called upon, I could and would competently testify to them.

1. I am a shareholder with the law firm of Greenberg Traurig, LLP, counsel for Plaintiffs Hakkasan Limited and Hakkasan LV, LLC ("Plaintiffs") in the above-referenced matter and I have personal knowledge of the facts set forth in this declaration.

2. This declaration is made in support of Plaintiffs' Motion to Strike the Motion to Set Aside Default and Default Judgment, Request for Evidentiary Hearing, and Motion to Stay

1 Execution of Judgment filed by Defendant EZ Lease Property Management, LLC a/k/a EZ Lease  
2 Propertys ("Defendant") in the above-captioned matter.

3 3. Prior to commencing litigation, on April 30, 2014, I sent a demand letter to Defendant  
4 regarding the infringing nature of its Internet Domain Names <mgmgrandhakkasan.com>,  
5 <mgmhakkasannightclub.com>, and <mgmgrandhakkasannightclub.com>. See April 30, 2014  
6 demand letter to Defendant, attached hereto as **Exhibit 1-A**.

7 4. On May 10, 2014, Defendant responded via email and offered to sell the domain  
8 names to Plaintiffs for \$2,000,000. See Email from Defendant dated May 10, 2014, attached hereto  
9 as **Exhibit 1-B**.

10 5. On or about May 14, 2014, I spoke to Keith Crawford, owner of Defendant, over the  
11 telephone regarding the April 30, 2014 demand letter and requested transfer of the domain names.  
12 During our conversation, I recommended that Mr. Crawford retain legal counsel.

13 6. I followed up with an email to Mr. Crawford, wherein I reiterated my  
14 recommendation that he retain counsel in this matter. See Email dated May 14, 2014, attached  
15 hereto as **Exhibit 1-C**.

16 7. Based on unsuccessful efforts to resolve this dispute, our client was forced to file suit  
17 against Defendant. On May 20, 2014, my law firm filed a complaint, motion for temporary  
18 restraining order and motion for preliminary injunction against Defendant on behalf of Plaintiffs.

19 8. Pursuant to the Court's Order granting the motion for a temporary restraining order,  
20 my law firm emailed the pleadings to Defendant at the email address listed in the Whois information  
21 for the infringing domain names and the same email address to/from which I had previously  
22 corresponded with Mr. Crawford. See Email from Cynthia Ney to Defendant dated May 27, 2014,  
23 attached hereto as **Exhibit 1-D**.

24 9. On May 27, 2014, Mr. Crawford responded to Ms. Ney's email essentially  
25 acknowledging the lawsuit against Defendant. See Email from Mr. Crawford dated May 27, 2014,  
26 attached hereto as **Exhibit 1-E**.

27 10. Defendant sent me another email on May 28, 2014, regarding the lawsuit and the  
28 domain names. This email came from a different email address, ezleasellc@gmail.com, but was

likely also from Mr. Crawford. See Email from Mr. Crawford dated May 28, 2014, attached hereto as **Exhibit 1-F**.

11. Defendant did not formally respond to the Complaint and did not participate in the lawsuit. Therefore, on July 23, 2014, the Court granted default judgment against Defendant in favor of Plaintiffs.

12. On December 11, 2014, our office obtained an Order from the Court setting the judgment debtor examination of the person most knowledgeable of Defendant.

13. In addition to attempting to serve the Order at Defendant's last known address, our office emailed a copy of the Order to Defendant. See Email dated December 11, 2014 from Cynthia Ney to Defendant, attached hereto as **Exhibit 1-G**.

14. Defendant, likely through Mr. Crawford, immediately responded. See Email response from Mr. Crawford, dated December 11, 2014, attached hereto as **Exhibit 1-H**.

15. Our office responded to Mr. Crawford and recommended that he obtain counsel in this matter. See Email from Shauna Norton to Mr. Crawford, dated December 15, 2014, attached hereto as **Exhibit 1-I**.

16. Mr. Crawford eventually implied that he had retained legal counsel and that such counsel would contact our firm. See Email from Mr. Crawford dated December 15, 2014, attached hereto as **Exhibit 1-J**.

17. My firm was never contacted by counsel for Defendant, and instead, we received yet another threatening and harassing email from Mr. Crawford regarding this case and the judgment. See Email from Mr. Crawford dated December 15, 2014, attached hereto as **Exhibit 1-K**.

18. The following day, we received the Motion filed by Mr. Crawford on behalf of Defendant.

DATED: December 19, 2014.

/s/ Lauri S. Thompson  
Lauri S. Thompson, Esq.



# **EXHIBIT 1-A**



In Reply:  
Lauri S. Thompson, Esq.  
Ph: (702) 792-3773  
Fax: (702) 792-9002  
[ThompsonL@gtlaw.com](mailto:ThompsonL@gtlaw.com)

April 30, 2014

VIA CERTIFIED MAIL &  
ELECTRONIC MAIL: [ezlease\\_property@yahoo.com](mailto:ezlease_property@yahoo.com)

Dale Crawford  
Keith Crawford  
EZ Lease Propertys  
3300 S. Decatur Blvd.  
Las Vegas, NV 89102

**Re: *Your Unauthorized Use and Registration of Internet Domain Names***  
***<mgmgrandhakkasan.com>, <mgmhakkasannightclub.com>, and***  
***<mgmgrandhakkasannightclub.com>***  
***Our Ref. 145472.014500***

Dear Sirs:

This firm represents Hakkasan Limited ("Hakkasan") in connection with various intellectual property matters. Hakkasan owns the exclusive right to use the HAKKASAN name and trademark in connection with, among other things, nightclubs, nightclub services, restaurant services, and bar and cocktail lounge services (the "HAKKASAN Mark"). In particular, Hakkasan owns several United States trademark registrations (US Reg. Nos. 4,458,604 and 3,789,248) and pending applications (US Ser. Nos. 86/183,960, 86/183,953 and 86/183,947) for the HAKKASAN Mark.

Since opening the original HAKKASAN in 2001 and its first United States location in 2009, Hakkasan has continuously and extensively used the HAKKASAN Mark to advertise and promote its properties in the United States and around the world, including its property located in Las Vegas, Nevada. HAKKASAN is one of the most well-known and respected names in the restaurant and nightclub industry. Hakkasan has spent millions of dollars advertising and promoting the HAKKASAN Mark in print, broadcast media and on the Internet through its websites located at [<hakkasan.com>](http://hakkasan.com) and [<hakkasanlv.com>](http://hakkasanlv.com). In addition, Hakkasan has made extensive use of the HAKKASAN Mark on, among other things, signage and promotional materials. The result of these efforts is that the HAKKASAN Mark has become distinctive and famous for nightclub, restaurant and bar services. Thus, it is imperative to Hakkasan that its HAKKASAN Mark is protected to the fullest extent permitted by law and that the public is not deceived as to the affiliation between its business activities and your own.

On or about April 18, 2013, your company EZ Lease Propertys ("EZ Lease") registered the Internet domain names [<mgmgrandhakkasan.com>](http://mgmgrandhakkasan.com), [<mgmhakkasannightclub.com>](http://mgmhakkasannightclub.com), and [<mgmgrandhakkasannightclub.com>](http://mgmgrandhakkasannightclub.com) (the "Infringing Domain Names"). EZ Lease later linked the Infringing Domain Names to live search and reference pages that contain various links to

LV 418926201v2

GREENBERG TRAURIG, LLP ■ ATTORNEYS AT LAW ■ [WWW.GTLAW.COM](http://WWW.GTLAW.COM)

3773 Howard Hughes Parkway ■ Suite 400 North ■ Las Vegas, NV 89169 ■ Tel 702.792.3773 ■ Fax 702.792.9002

April 30, 2014

Page 2

the MGM Grand Hotel in Las Vegas, Nevada, as well as several other Las Vegas links. These activities have infringed Hakkasan's intellectual property rights and must cease immediately.

Specifically, the registration and use of the Infringing Domain Names by your company violates the Anti-cybersquatting Consumer Protection Act (the "ACPA"), 15 U.S.C. § 1125(d), which Congress passed into law in 1999. Congress' stated purpose for that law was to prevent cybersquatting by "prohibiting the bad faith and abusive registration of distinctive marks as Internet domain names with the intent to profit from the goodwill associated with such marks." To assert a successful cybersquatting claim against EZ Lease, Hakkasan must demonstrate: (1) the HAKKASAN name is distinctive and protected as a mark; (2) the Infringing Domain Names are identical and/or confusingly similar to that mark; and (3) EZ Lease possesses the bad faith intent to profit from registration of the domain names. See 15 U.S.C. § 1125(d).

Hakkasan can easily demonstrate each of these elements. First, as discussed, Hakkasan is among the most well-known restaurant and nightclub operators in the world. Consumers in the United States and throughout the world associate Hakkasan and the HAKKASAN Mark with the highest quality restaurant and nightclub services.

Second, the Infringing Domain Names contain the entirety of our client's HAKKASAN Mark, accompanied only by various descriptive terms denoting the type of services provided by our client and/or the geographic location of its Las Vegas Hakkasan Nightclub.

Finally, we can show that EZ Lease possesses a bad faith intent to profit from registration of the Infringing Domain Names. By connecting the domain names to websites that provide pay-per-click links to websites that offer related services, we can presume that you and your company wrongfully registered the Infringing Domain Names with the intent to profit from the reputation and goodwill vested in Hakkasan.

The ACPA provides that plaintiffs, such as Hakkasan, may collect up to \$100,000 in damages (per domain name) from cybersquatters. EZ Lease illegally registered the Infringing Domain Names with the bad faith intent to profit from those registrations. As such, if Hakkasan is compelled to file suit against you and your company, it will request that the Court levy the maximum amount of damages. It would also request reimbursement of all attorney's fees and costs expended to recover the Infringing Domain Names.

In addition to EZ Lease's clear violation of the ACPA, the registration and use of the Infringing Domain Names constitutes (among other things) trademark infringement and unfair competition under the federal Lanham Act. Your company's use of the HAKKASAN Mark in the domain names while linking the domain names to your websites, creates a strong likelihood of confusion among the relevant consuming public. In other words, one visiting these sites would assume that there is some connection with, or endorsement of your activities by Hakkasan. This "likelihood of confusion" determination lies at the heart of an infringement analysis. See 15 U.S.C. §§ 1114, 1125.

Hakkasan possesses several other claims against you and your company for your unlawful and unauthorized use of the HAKKASAN Mark, which could subject you to significantly more damages should Hakkasan be forced to file suit against you. Our client, however, would prefer to resolve this matter amicably and without court action, if such a resolution can be reached expeditiously. As such, Hakkasan will refrain from immediately filing suit if you respond to this communication by no later than **Monday, May 12, 2014**, to discuss potential settlement options, which will include transferring the Infringing Domain Names to Hakkasan.

LV 418926201v2

April 30, 2014

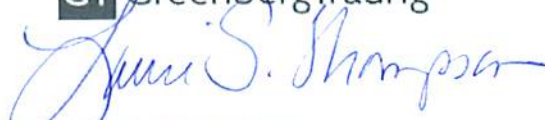
Page 3

Please note that any attempt to sell, transfer, or dispose of the Infringing Domain Names in any manner without the express consent of Hakkasan is prohibited. Any transfer, disposition, or alteration of the registration information for the Infringing Domain Names without Hakkasan's approval and consent, throughout the pendency of this dispute, is unlawful and will subject you and your company to further damages and liability under the ACPA and other state and federal statutes.

Once again, Hakkasan considers your actions to be very serious. Failure to respond in a timely fashion will force our client to explore options that will include judicial intervention. Thank you in advance for your anticipated cooperation. Please feel free to contact me with any questions.

Sincerely,

 GreenbergTraurig



Lauri S. Thompson

LST/SW/ilh  
Enclosure



# United States of America

United States Patent and Trademark Office

## HAKKASAN

**Reg. No. 3,789,248**

**Registered May 18, 2010**

**Int. Cls.: 9, 16 and 43**

**TRADEMARK**

**SERVICE MARK**

**PRINCIPAL REGISTER**

HAKKASAN LIMITED (UNITED KINGDOM LIMITED LIABILITY COMPANY)  
151 WARDOUR STREET  
4TH FLOOR  
LONDON, UNITED KINGDOM W1F8WF

FOR: PUBLICATIONS IN ELECTRONIC FORM, NAMELY, DOWNLOADABLE ELECTRONIC PUBLICATIONS IN THE NATURE OF MAGAZINES AND BOOKS IN THE FIELD OF FOOD, FINE DINING, THE CULINARY ARTS, HOSPITALITY INDUSTRY, MUSIC, SOCIAL EVENTS AND TRAVEL; PRE-RECORDED VIDEOS, CD ROM'S, TAPES, CASSETTES, CDS, DVDS IN THE FIELD OF FOOD, FINE DINING, THE CULINARY ARTS, HOSPITALITY INDUSTRY, MUSIC, SOCIAL EVENTS AND TRAVEL; KITCHEN SCALES; WEIGHING AND MEASURING APPARATUS, NAMELY, MEASURING CUPS AND MEASURING SPOONS, IN CLASS 9 (U.S. CLS. 21, 23, 26, 36 AND 38).

FOR: PUBLICATIONS AND PRINTED MATTER, NAMELY, PAMPHLETS, BROCHURES, NEWSLETTERS, JOURNALS AND MAGAZINES IN THE FIELD OF FOOD, FINE DINING, THE CULINARY ARTS, HOSPITALITY INDUSTRY, MUSIC, SOCIAL EVENTS AND TRAVEL; CALENDARS, PRINTED MENUS, COOKBOOKS; PRINTED INSTRUCTIONAL AND TEACHING MATERIALS IN THE FIELD OF FOOD, FINE DINING, THE CULINARY ARTS, HOSPITALITY INDUSTRY, MUSIC, SOCIAL EVENTS AND TRAVEL; PLASTIC MATERIALS FOR PACKAGING, NAMELY, PLASTIC BAGS FOR PACKAGING; STATIONERY: PAPER, CARDBOARD AND GOODS MADE FROM THESE MATERIALS, NAMELY, COASTERS OF PAPER, PLACE CARDS AND CARDBOARD BOXES, PAPER NAME BADGES; BAGS OF PLASTIC FOR PACKAGING; PAPER BAGS; BOOK MARKS; BOXES OF CARDBOARD OR PAPER; GIFT CARDS, NOTE CARDS; CATALOGUES IN THE FIELD OF FOOD, FINE DINING, THE CULINARY ARTS, HOSPITALITY INDUSTRY, MUSIC, SOCIAL EVENTS AND TRAVEL; FOLDED GREETING CARDS; PAPER GIFT TAGS; GIFT WRAPPING PAPER; NOTEBOOKS; INSTRUCTIONAL MATERIAL (EXCEPT APPARATUS), NAMELY, TEXTBOOKS IN THE FIELD OF FOOD, FINE DINING, THE CULINARY ARTS AND THE HOSPITALITY INDUSTRY AND PRINTED CHARTS, IN CLASS 16 (U.S. CLS. 2, 5, 22, 23, 29, 37, 38 AND 50).

FOR: RESTAURANT SERVICES; CAFÉ SERVICES; BAR SERVICES; CATERING FOR THE PROVISION OF FOOD AND DRINK; CATERING SERVICES; PROVISION OF FOOD AND DRINK BY A RESTAURANT, IN CLASS 43 (U.S. CLS. 100 AND 101).

THE MARK CONSISTS OF STANDARD CHARACTERS WITHOUT CLAIM TO ANY PARTICULAR FONT, STYLE, SIZE, OR COLOR.



*David J. Kypos*

Director of the United States Patent and Trademark Office

OWNER OF ERPN CMNTY TM OFC REG. NO. 4151916, DATED 12-2-2005, EXPIRES 12-1-2014.

THE WORDING "HAKKASAN" HAS NO MEANING IN A FOREIGN LANGUAGE.

**United States of America**  
**United States Patent and Trademark Office**

**HAKKASAN**

**Reg. No. 4,458,604**

**Registered Dec. 31, 2013**

**Int. Cl.: 41**

**SERVICE MARK**

**PRINCIPAL REGISTER**

HAKKASAN LIMITED (UNITED KINGDOM LIMITED LIABILITY COMPANY)  
4TH FLOOR  
151 WARDOUR STREET  
LONDON, UNITED KINGDOM W1F8WE

FOR: NIGHT CLUBS; NIGHT CLUB SERVICES IN THE NATURE OF RESERVATION AND BOOKING SERVICES FOR THE PURPOSE OF ARRANGING FOR ADMISSION TO NIGHT CLUBS AND NIGHT CLUB EVENTS, AND ARRANGING AND COORDINATING NIGHTCLUB PARTIES AND ENTERTAINMENT EVENTS; DANCE CLUB SERVICES; ENTERTAINMENT SERVICES IN THE NATURE OF PROVIDING LIVE MUSICAL, DANCE, AND THEATRICAL PERFORMANCES; CONSULTATION IN THE FIELD OF SPECIAL EVENT PLANNING FOR SOCIAL ENTERTAINMENT SERVICES, IN CLASS 41 (U.S. CLS. 100, 101 AND 107).

FIRST USE 4-18-2009; IN COMMERCE 4-18-2009.

THE MARK CONSISTS OF STANDARD CHARACTERS WITHOUT CLAIM TO ANY PARTICULAR FONT, STYLE, SIZE, OR COLOR.

OWNER OF U.S. REG. NO. 3,789,248.

SER. NO. 85-928,057, FILED 5-9-2013.

JENNIFER DIXON, EXAMINING ATTORNEY



*Deborah S. Cohen*

Commissioner for Trademarks of the  
United States Patent and Trademark Office

# **EXHIBIT 1-B**

**Ney, Cynthia (Para-LV-LT)**

---

**From:** Ez Lease Property Management L <ezlease\_property@yahoo.com>  
**Sent:** Saturday, May 10, 2014 3:30 AM  
**To:** Hinde, Ingrid L. (Secy-LV-IP-Tech)  
**Subject:** Re: Registered: Legal Correspondence for Your Review

Hello, In response to your letter dated April 30th 2014 regarding the infringement of said domain names mgmgrandhakkasan.com , mgmgrandhakkasannightclub.com & mgmhakkasannightclub.com. Upon our investigation and consulting with our legal team we are aware of these domain names and we do not agree with your infringement claims! Yes you do have the trademark of the word HAKKASAN, but you do not have the trademark of the words...

mgmgrandhakkasan.com , mgmgrandhakkasannightclub.com & mgmhakkasannightclub.com their for we are not infringing on your trademark. We have also been advised that if we were infringing you would have to right to take these domains from us without our consent, but as we can see that has not happen. There for we are offering to sell all of these domain names to you if you wish to purchase them for the sum of Two Million Dollars(\$2,000,000.00). Please email us back to confirm purchase and transfer.

Thank you

Ez Lease Property Management LLC  
[ezlease\\_property@yahoo.com](mailto:ezlease_property@yahoo.com)

On Wednesday, April 30, 2014 3:05 PM, "[hindei@gtlaw.com](mailto:hindei@gtlaw.com)" <[hindei@gtlaw.com](mailto:hindei@gtlaw.com)> wrote:



This is a Registered Email® message from [hindei@gtlaw.com](mailto:hindei@gtlaw.com).

---

SENT ON BEHALF OF LAURI THOMPSON, ESQ.

Gentlemen:

Attached please find important legal correspondence for your review and response by no later than May 12, 2014. Your email response should be sent to [ThompsonL@gtlaw.com](mailto:ThompsonL@gtlaw.com) or you can contact us at the telephone numbers listed below.

**Ingrid L. Hinde**

Intellectual Property/Transactional Legal Assistant to  
Lauri S. Thompson, Edward "Ted" Quirk, Jonathan Leleu and Peter H. Ajemian  
Greenberg Traurig, LLP | Suite 400 North  
3773 Howard Hughes Parkway | Las Vegas, Nevada 89169  
Tel 702.938.6924 - Fax: 702-792-9002 - Direct: 702-938-6924  
[Hindel@gtlaw.com](mailto:Hindel@gtlaw.com) | [www.gtlaw.com](http://www.gtlaw.com)





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# **EXHIBIT 1-C**

## Ney, Cynthia (Para-LV-LT)

---

**From:** Thompson, Lauri S. (Shld-LV-IP-Tech)  
**Sent:** Wednesday, May 14, 2014 1:18 PM  
**To:** Ez Lease Property Management L  
**Cc:** ezleasellc@gmail.com; Hinde, Ingrid L. (Secy-LV-IP-Tech)  
**Subject:** RE: Infringement claim dated April 30th 2014

Dear Dale and Keith Crawford,

Thank you Keith for taking my phone call today. I advised you to retain legal counsel that is proficient in trademark law. Registering domain names that include others' trademarks, then offering to sell the domains to the trademark owner is a form of cybersquatting governed by the Anti-Cybersquatting Protection Act statutes. The ACPA allows for statutory damages of up to \$100,000 per infringing domain name, plus attorney fees and costs to be awarded to the trademark owner.

Keith did state that we should go ahead and file the lawsuit. While I think this is a waste of resources, please be assured that both MGM and Hakkasan have filed many cybersquatting lawsuits against infringers that do not agree to transfer their domains back to them. Both companies take this very seriously. If I do not hear back from you or your lawyer today, I will report your non-compliance to my client so they may prepare for litigation.

Thank you for your immediate attention to this matter.

Lauri Thompson  
Shareholder  
Greenberg Traurig, LLP | Suite 400 North  
3773 Howard Hughes Parkway | Las Vegas, Nevada 89169  
Tel 702.938.6886 | Cell 702.595.1995  
[ThompsonL@gtlaw.com](mailto:ThompsonL@gtlaw.com) | [www.gtlaw.com](http://www.gtlaw.com)



---

**From:** Ez Lease Property Management L [[mailto:ezlease\\_propertyts@yahoo.com](mailto:ezlease_propertyts@yahoo.com)]  
**Sent:** Saturday, May 10, 2014 12:57 PM  
**To:** Thompson, Lauri S. (Shld-LV-IP-Tech)  
**Subject:** Infringement claim dated April 30th 2014

Hello, In response to your letter dated April 30th 2014 regarding the infringement of said domain names mgmgrandhakkasan.com , mgmgrandhakkasannightclub.com & mgmhakkasannightclub.com. Upon our investigation and consulting with our legal team we are aware of these domain names and we do not agree with your infringement claims! Yes you do have the trademark of the word HAKKASAN, but you do not have the trademark of the words...

mgmgrandhakkasan.com , mgmgrandhakkasannightclub.com & mgmhakkasannightclub.com their for we are not infringing on your trademark. We have also been advised that if we were infringing you would have to right to take these domains from us without our consent, but as we can see that has not happen. There for we are offering to sell all of these domain names to you if you wish to purchase them for the sum of Two Million Dollars(\$2,000,000.00). Please email us back to confirm purchase and transfer.

Thank you

Ez Lease Property Management LLC  
[ezlease\\_property@yahoo.com](mailto:ezlease_property@yahoo.com)

# **EXHIBIT 1-D**

**Ney, Cynthia (Para-LV-LT)**

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**From:** Ney, Cynthia (Para-LV-LT)  
**Sent:** Tuesday, May 27, 2014 4:57 PM  
**To:** ezlease\_propertyys@yahoo.com  
**Subject:** LEGAL NOTICE (Sent Registered)  
**Attachments:** 001 - COMPLAINT.PDF; 003 - Ex Parte Application for Temporay Restraining Order.PDF; TRO Order.pdf; 006 - Summons (issued).PDF

**NOTICE TO REGISTRANT**

[ezlease\\_propertyys@yahoo.com](mailto:ezlease_propertyys@yahoo.com)

EZ Lease Propertyys  
3300 S. Decatur Blvd., Suite 10119  
Las Vegas, NV 89102

Re: Hakkasan LV, LLC, et al.

v.

EZ Lease Property Management, LLC

Our matter no. 145472.014500

Attachments: Granted TRO, Filed Complaint, Filed Application for TRO and Motion for Preliminary Injunction and Exhibits, Issued Summons

The person and/or entity referenced above has been sued in Case No. 2:14-cv-00798-APG-GWF in the United States District Court for the District of Nevada for cybersquatting (15 U.S.C. § 1125(d)), trademark infringement (15 U.S.C. § 1114), unfair competition (15 U.S.C. § 1125(a)), common law trademark infringement, deceptive trade practices (N.R.S. § 598.0903 et seq.) and intentional interference with prospective economic advantage for the registration and use of the <mgmgrandhakkasan.com>, <mgmgrandhakkasannightclub.com> and <mgmhakkasannightclub.com> domain names. By Court Order, the attached documents are to be served on Defendant by e-mail, based upon the electronic mail contact information provided by Defendant to the domain name registrar, to provide timely notice to Defendant that Plaintiff's Motion for Preliminary Injunction will be heard by the Court on June 2, 2014 at 9:30 a.m. in Courtroom 6C of the United States District Court located at 333 Las Vegas Boulevard South, Las Vegas, Nevada, 89101. Defendants may file and serve opposition papers, if any, no later than May 29, 2014. Defendants must appear before the Court on June 2, 2014 or suffer judgment to be entered in favor of Plaintiff.

# **EXHIBIT 1-E**

**Ney, Cynthia (Para-LV-LT)**

---

**From:** Ez Lease Property Management L <ezlease\_propertyts@yahoo.com>  
**Sent:** Tuesday, May 27, 2014 7:50 PM  
**To:** Ney, Cynthia (Para-LV-LT)  
**Subject:** Re: Registered: LEGAL NOTICE

I mean seriously? Can't we settle this without going through this? We didn't get these domain names for free you know! Can we settle this without the courts or do you want to spend unnecessary court fees? Waiting for your response

Ez Lease Property Management LLC  
[ezlease\\_propertyts@yahoo.com](mailto:ezlease_propertyts@yahoo.com)

On Tuesday, May 27, 2014 4:58 PM, "[neyc@gtlaw.com](mailto:neyc@gtlaw.com)" <[neyc@gtlaw.com](mailto:neyc@gtlaw.com)> wrote:



This is a Registered Email® message from [neyc@gtlaw.com](mailto:neyc@gtlaw.com).

---

**NOTICE TO REGISTRANT**

[ezlease\\_propertyts@yahoo.com](mailto:ezlease_propertyts@yahoo.com)  
EZ Lease Propertyts  
3300 S. Decatur Blvd., Suite 10119  
Las Vegas, NV 89102

Re: Hakkasan LV, LLC, et al.

v.

EZ Lease Property Management, LLC

Our matter no. 145472.014500

**Attachments:** Granted TRO, Filed Complaint, Filed Application for TRO and Motion for Preliminary Injunction and Exhibits, Issued Summons

The person and/or entity referenced above has been sued in Case No. 2:14-cv-00798-APG-GWF in the United States District Court for the District of Nevada for cybersquatting (15 U.S.C. § 1125(d)), trademark infringement (15 U.S.C. § 1114), unfair competition (15 U.S.C. § 1125(a)), common law trademark infringement, deceptive trade practices (N.R.S. § 598.0903 et seq.) and intentional interference with prospective economic advantage for the registration and use of the <mgmgrandhakkasan.com>, <mgmgrandhakkasannightclub.com> and <mgmhakkasannightclub.com> domain names. By Court Order, the attached documents are to be



served on Defendant by e-mail, based upon the electronic mail contact information provided by Defendant to the domain name registrar, to provide timely notice to Defendant that Plaintiff's Motion for Preliminary Injunction will be heard by the Court on June 2, 2014 at 9:30 a.m. in Courtroom 6C of the United States District Court located at 333 Las Vegas Boulevard South, Las Vegas, Nevada, 89101. Defendants may file and serve opposition papers, if any, no later than May 29, 2014. Defendants must appear before the Court on June 2, 2014 or suffer judgment to be entered in favor of Plaintiff.

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# **EXHIBIT 1-F**

**Ney, Cynthia (Para-LV-LT)**

---

**From:** ezleasellc <ezleasellc@gmail.com>  
**Sent:** Wednesday, May 28, 2014 7:27 PM  
**To:** Thompson, Lauri S. (Shld-LV-IP-Tech)  
**Cc:** Burrell, Laraine (Assoc-LV-LT); Hinde, Ingrid L. (Secy-LV-IP-Tech); Ney, Cynthia (Para-LV-LT)  
**Subject:** Re: Infringement claim dated April 30th 2014  
**Attachments:** 145472.014500 - Domain Name Response.pdf

To: Who It may concern 5/28/2014

From: Ez lease Property Management LLC

Subject: Our matter no. 145472.014500

The Domain names in question - MgmhakkAsan.com, MgmgrandhakkAsan.com, MgmhakkAsanNightclub.com where own by us from 4/18/2013 to 4/18/2014. At the time the plaintiff sent us their treating emails and phone calls these domain names were in a renewal process and we were not the legal owners! These domain names where not purchased and then an email was sent to the plaintiff asking for payment for them. The payment of the two million dollars did not come until we receive treats from the plaintiff! We did not legal own these domain names so their is really not a case here and all they had to do was to check and see that we did not own them at that time! These domain names were only purchased and used for of our website promoting New and the Most Grossing Night Clubs In Las Vegas! We did not make any money from these domain names they were only used to promote the plaintiffs club! If the plaintiff would not have emailed and call us with the treats this would have never happen! The plaintiffs cannot prove their were any monetary damages because their were not any and as of 4/18/2014 we legally did not own these domain names. We have enclosed our cancel email of these domain names and they will be given back to the plaintiffs. We have no used for them and if the plaintiff would have been nice we would have told them this from the start! If the plaintiff chooses to try and prove their were damages regarding these domain names then we will let our attorneys fight this issues but we truly think that would be a waste or both of our time and unnecessary money! As for us and Ez Lease Property Management LLC this lawsuit is over and done with! We thank you for your time, and hope that you will end this matter in a most civil and peaceful way.

Thanks again

Ez Lease Property Management LLC  
Dear Ez Lease Propertys,

Thank you for choosing Register.com as your web services provider. Below is confirmation of your order:

Date (MM/DD/YYYY): 05/10/2014  
 Name: Ez Lease Property  
 Company:  
 Address 1: suite A69 ,848 rainbow blvd  
 Address 2:  
 City: Las Vegas  
 Country: US  
 State: NV  
 Postal code: 89107

<b>Services</b>	<b>Billing Cycle</b>	<b>Status</b>	<b>Price</b>
<a href="http://mgmgrandhakkasan.com">mgmgrandhakkasan.com</a>	1 year	CANCELED	\$0.00
Reinstatement Fee	0	CANCELED	\$0.00
<a href="http://mgmgrandhakkasannightclub.com">mgmgrandhakkasannightclub.com</a>	1 year	CANCELED	\$0.00
Reinstatement Fee	0	CANCELED	\$0.00
<a href="http://mgmhakkasannightclub.com">mgmhakkasannightclub.com</a>	1 year	CANCELED	\$0.00
Reinstatement Fee	0	CANCELED	\$0.00

Total: \$0.00

On Wed, May 28, 2014 at 5:06 PM, <[ThompsonL@gtlaw.com](mailto:ThompsonL@gtlaw.com)> wrote:

Mr. Crawford,

You had emailed me previously saying you had legal representation. If so, I must speak to your attorney. If you do not have counsel, you will need to retain counsel to appear before the court. My client is going to require a court order for a permanent injunction. If you wish, you can stipulate to this to avoid the protracted litigation. However, my client will also require an amount in damages to be paid to them. I do not have an amount they will accept yet- but I can discuss this.

Please let me know about the status of your legal representation and if you wish to proceed with discussions regarding the settlement I have outlined.

Thank you,

Lauri

Lauri Thompson  
 Shareholder  
 Greenberg Traurig, LLP | Suite 400 North

3773 Howard Hughes Parkway | Las Vegas, Nevada 89169  
Tel [702.938.6886](tel:702.938.6886) | Cell [702.595.1995](tel:702.595.1995)

[ThompsonL@gtlaw.com](mailto:ThompsonL@gtlaw.com) | [www.gtlaw.com](http://www.gtlaw.com)



**From:** ezleasellc [mailto:[ezleasellc@gmail.com](mailto:ezleasellc@gmail.com)]  
**Sent:** Tuesday, May 27, 2014 8:18 PM

**To:** Thompson, Lauri S. (Shld-LV-IP-Tech)  
**Subject:** Re: Infringement claim dated April 30th 2014

Ok look this is really not necessary! You can have the domains back! But we did had to pay for them you know! We havent used these domain names in any appropriate way and its truly not that serious with us! Please email me back so we can handle this in a civil matter.

On Wed, May 14, 2014 at 1:18 PM, <[ThompsonL@gtlaw.com](mailto:ThompsonL@gtlaw.com)> wrote:

Dear Dale and Keith Crawford,

Thank you Keith for taking my phone call today. I advised you to retain legal counsel that is proficient in trademark law.

Registering domain names that include others' trademarks, then offering to sell the domains to the trademark owner is a form of cybersquatting governed by the Anti-Cybersquatting Protection Act statutes. The ACPA allows for statutory damages of up to \$100,000 per infringing domain name, plus attorney fees and costs to be awarded to the trademark owner.

Keith did state that we should go ahead and file the lawsuit. While I think this is a waste of resources, please be assured that both MGM and Hakkasan have filed many cybersquatting lawsuits against infringers that do not agree to transfer their domains back to them. Both companies take this very seriously. If I do not hear back from you or your lawyer today, I will report your non-compliance to my client so they may prepare for litigation.

Thank you for your immediate attention to this matter.

**Lauri Thompson**  
Shareholder  
Greenberg Traurig, LLP | Suite 400 North  
3773 Howard Hughes Parkway | Las Vegas, Nevada 89169  
Tel [702.938.6886](tel:702.938.6886) | Cell [702.595.1995](tel:702.595.1995)

[ThompsonL@gtlaw.com](mailto:ThompsonL@gtlaw.com) | [www.gtlaw.com](http://www.gtlaw.com)



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**From:** Ez Lease Property Management L [mailto:[ezlease\\_propertyts@yahoo.com](mailto:ezlease_propertyts@yahoo.com)]  
**Sent:** Saturday, May 10, 2014 12:57 PM  
**To:** Thompson, Lauri S. (Shld-LV-IP-Tech)  
**Subject:** Infringement claim dated April 30th 2014

Hello, In response to your letter dated April 30th 2014 regarding the infringement of said domain names [mgmgrandhakkasan.com](http://mgmgrandhakkasan.com) , [mgmgrandhakkasannightclub.com](http://mgmgrandhakkasannightclub.com) & [mgmhakkasannightclub.com](http://mgmhakkasannightclub.com). Upon our investigation and consulting with our legal team we are aware of these domain names and we do not agree with your infringement claims! Yes you do have the trademark of the word HAKKASAN, but you do not have the trademark of the words...  
[mgmgrandhakkasan.com](http://mgmgrandhakkasan.com) , [mgmgrandhakkasannightclub.com](http://mgmgrandhakkasannightclub.com) & [mgmhakkasannightclub.com](http://mgmhakkasannightclub.com) their for we are not infringing on your trademark. We have also been advised that if we were infringing you would have to right to take these domains from us without our consent, but as we can see that has not happen. There for we are offering to sell all of these domain names to you if you wish to purchase them for the sum of Two Million Dollars(\$2,000,000.00). Please email us back to confirm purchase and transfer.

Thank you

Ez Lease Property Management LLC  
[ezlease\\_propertyts@yahoo.com](mailto:ezlease_propertyts@yahoo.com)

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--

Dale Crawford  
Ez Lease Property Management LLC  
[ezleaselc@gmail.com](mailto:ezleaselc@gmail.com)  
[702 582-5685](tel:7025825685) Cell

--

Dale Crawford  
Ez Lease Property Management LLC  
[ezleaselc@gmail.com](mailto:ezleaselc@gmail.com)  
702 582-5685 Cell

# **EXHIBIT 1-G**



**Ney, Cynthia (Para-LV-LT)**

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**From:** Ney, Cynthia (Para-LV-LT)  
**Sent:** Thursday, December 11, 2014 4:06 PM  
**To:** Ez Lease Property Management L  
**Cc:** Thompson, Lauri S. (Shld-LV-IP-Tech); Norton, Shauna (Assoc-LV-IP-Tech); BurrellL@gtlaw.com  
**Subject:** Hakkasan - EZ Lease - LEGAL NOTICE (Sent Registered)  
**Attachments:** 026 - order setting exam (EZ Lease) (with attachment).pdf

Attached please find an order issued by the court setting a judgment debtor's examination for January 7, 2014 which requires your attention. Thank you.

Cynthia Ney  
Paralegal  
Greenberg Traurig, LLP | Suite 400 North  
3773 Howard Hughes Parkway | Las Vegas, Nevada 89169  
Tel 702.599.8009  
[nevc@gtlaw.com](mailto:nevc@gtlaw.com) | [www.gtlaw.com](http://www.gtlaw.com)



# **EXHIBIT 1-H**

**Ney, Cynthia (Para-LV-LT)**

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**From:** ezlease\_propertyts@yahoo.com  
**Sent:** Thursday, December 11, 2014 9:21 PM  
**To:** Norton, Shauna (Assoc-LV-IP-Tech)  
**Subject:** Re: Registered: Hakkasan - EZ Lease - LEGAL NOTICE

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

I or anyone from my company is not appearing in no ones court! We do not own any domains of this name or have made any financial gain from this so you are wasting your time and your money filing this! Good bye

Sent from my iPhone

On Dec 11, 2014, at 8:21 PM, <[nortons@gtlaw.com](mailto:nortons@gtlaw.com)> wrote:

> Sir,  
>  
> We will not debate the merits of the case with you at this juncture.  
> Our client has a federal court judgment against your company and has  
> instructed us to proceed with enforcement of its judgement.  
> Accordingly, among other things, we will be deposing the person most  
> knowledgeable of the company. Please note that failure to appear is a  
> direct violation of a court order and may result in your being held in  
> contempt of court. Thank you,  
>  
> Shauna  
>  
> Sent from my iPhone  
>  
>  
> From: [ezlease\\_propertyts@yahoo.com](mailto:ezlease_propertyts@yahoo.com)<[mailto:ezlease\\_propertyts@yahoo.com](mailto:ezlease_propertyts@yahoo.com)>  
> [[mailto:ezlease\\_propertyts@yahoo.com](mailto:ezlease_propertyts@yahoo.com)]  
> Sent: Thursday, December 11, 2014 4:19 PM  
> To: Ney, Cynthia (Para-LV-LT)  
> Subject: Re: Registered: Hakkasan - EZ Lease - LEGAL NOTICE  
>

> I or our company does not own this domain name!!! Please check your findings!  
>  
> Sent from my iPhone  
>

> On Dec 11, 2014, at 4:07 PM, "[neyc@gtlaw.com](mailto:neyc@gtlaw.com)<<mailto:neyc@gtlaw.com>>"  
<[neyc@gtlaw.com](mailto:neyc@gtlaw.com)<<mailto:neyc@gtlaw.com>>> wrote:

> [\*\*\*RPost Registered Email\*\*\*]  
>  
>  
>

> This is a Registered Email® message from [neyc@gtlaw.com](mailto:neyc@gtlaw.com)<<mailto:neyc@gtlaw.com>>.  
>

> \_\_\_\_\_  
>  
> Attached please find an order issued by the court setting a judgment debtor's examination for January 7, 2014 which requires your attention. Thank you.  
>  
> Cynthia Ney  
> Paralegal  
> Greenberg Traurig, LLP | Suite 400 North  
> 3773 Howard Hughes Parkway | Las Vegas, Nevada 89169 Tel 702.599.8009  
> [neyc@gtlaw.com](mailto:neyc@gtlaw.com)<<mailto:neyc@gtlaw.com>> |  
> [www.gtlaw.com](http://www.gtlaw.com)<<http://www.gtlaw.com>>  
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> <image001.jpg>  
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> If you are not an intended recipient of confidential and privileged information in this email, please delete it, notify us immediately at [postmaster@gtlaw.com](mailto:postmaster@gtlaw.com)<<mailto:postmaster@gtlaw.com>>, and do not use or disseminate such information.  
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> Click here<<https://rmail.rpost.com/RMAIL/autologin.aspx?rr=40DA25FF>> to send a Registered Email® message to anyone.  
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> [[http://open.rpost.net/5AADFFD7DD94808C4D26DFA8D988A7BFC863CC9E-1\\_C2569658EE25C1EEDB240A7DAEB03AC6176F0933/rpost.gif](http://open.rpost.net/5AADFFD7DD94808C4D26DFA8D988A7BFC863CC9E-1_C2569658EE25C1EEDB240A7DAEB03AC6176F0933/rpost.gif)]  
> <026 - order setting exam (EZ Lease) (with attachment).pdf>  
> <image001.jpg>

# **EXHIBIT 1-I**

**Ney, Cynthia (Para-LV-LT)**

---

**From:** Norton, Shauna (Assoc-LV-IP-Tech)  
**Sent:** Monday, December 15, 2014 3:20 PM  
**To:** 'Ez Lease Property Management L'  
**Cc:** Thompson, Lauri S. (Shld-LV-IP-Tech); Laraine Burrell (BurrellL@gtlaw.com)  
**Subject:** RE: Registered: Hakkasan - EZ Lease - LEGAL NOTICE

Thank you for your cooperation in transferring the <mgmhakkasan.com> domain name. However, we will not withdraw the judgment and we will continue with our efforts to enforce that judgment by all available means, unless and until you provide our client with an acceptable settlement. If you recall, we contacted you multiple times before filing the lawsuit about your unlawful use and registration of the domain names at issue. Unfortunately these communications were unproductive as your response was to offer to sell the domain names to Hakkasan for \$2,000,000. Your actions left our client with no other option than to proceed with litigation. Hakkasan now has a federal judgment against your company. It is clear that you do not understand the law or the legal process in general, therefore, it would be wise for you to retain counsel at this point.

**Shauna Norton**  
 Associate  
 Greenberg Traurig, LLP | Suite 400 North  
 3773 Howard Hughes Parkway | Las Vegas, Nevada 89169  
 Tel 702.599.8011 | Fax 702.792.9002  
[nortons@gtlaw.com](mailto:nortons@gtlaw.com) | [www.gtlaw.com](http://www.gtlaw.com)



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PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL

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**From:** Ez Lease Property Management L [[mailto:ezlease\\_property@yahoo.com](mailto:ezlease_property@yahoo.com)]  
**Sent:** Sunday, December 14, 2014 1:37 AM  
**To:** Norton, Shauna (Assoc-LV-IP-Tech)  
**Subject:** Re: Registered: Hakkasan - EZ Lease - LEGAL NOTICE

In regard to this domain name MGMHAKKASAN.COM we have contacted the domain company network solutions for the transfer of this domain name to you!! But we want you to withdrawal you're judgement upon transfer which is completely false!! This domain was not ever purchased to infringed or bought to sell back to MGM OR HAKKASAN they were only purchase to promote the new night clubs on a website that we no longer have that were coming to Las Vegas!! You do not have any proof of cyber squatting or any emails to either company asking for the purchase of these domain names by your company!! The domain name MGMHAKKASAN.COM should have expired from us April of 2014 but network solutions took it upon themselves to renew this domain main name without our knowledge! We did not even know that we were still the owners of this domain name until now! This domain name has not been advertised in any way by us and we have not done any infringing of any kind regarding any of your domain names!! There has been no monetary gain or any confusion caused from any of these domain names so you're judgement and demands are completely false!!

If any demands are falsely awarded to you we will contact our lawyers and sue you for defamation! We are closing the account with the company network solutions that this domain name belongs to and are hosting, so we need your

domain hosting information so we can start the transfer of this domain name!! There are no other domain names that belongs to use regarding this name!

We await you information to start transfer!!

Ez Lease Property Management LLC  
[ezlease\\_propertyys@yahoo.com](mailto:ezlease_propertyys@yahoo.com)

On Friday, December 12, 2014 11:44 AM, "[ezlease\\_propertyys@yahoo.com](mailto:ezlease_propertyys@yahoo.com)" <[ezlease\\_propertyys@yahoo.com](mailto:ezlease_propertyys@yahoo.com)> wrote:

This domain shouldn't have been renewed! It appears that domain company took upon itself to renew this domain! We will transfer! We didn't even know we still owned it so contacting us first will have save you and the company you represent alot of time and money! We will see what it takes to make transfer!

Sent from my iPhone

On Dec 12, 2014, at 11:33 AM, <[nortons@gtlaw.com](mailto:nortons@gtlaw.com)> wrote:

> Our client will not pay you for a domain name that you illegally registered in the first place and that you continued to own in violation of the court's order.

>

> Shauna Norton

> Associate

> Greenberg Traurig, LLP | Suite 400 North

> 3773 Howard Hughes Parkway | Las Vegas, Nevada 89169

> Tel 702.599.8011 | Fax 702.792.9002

> [nortons@gtlaw.com](mailto:nortons@gtlaw.com) | [www.gtlaw.com](http://www.gtlaw.com)

>

>

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>

> PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL

>

> -----Original Message-----

> From: [ezlease\\_propertyys@yahoo.com](mailto:ezlease_propertyys@yahoo.com) [mailto:[ezlease\\_propertyys@yahoo.com](mailto:ezlease_propertyys@yahoo.com)]

> Sent: Friday, December 12, 2014 11:26 AM

> To: Norton, Shauna (Assoc-LV-IP-Tech)

> Subject: Re: Registered: Hakkasan - EZ Lease - LEGAL NOTICE

>

> Ok we have received information regarding this domain! Are you will to pay the price that was paid for this domain?

>

> Sent from my iPhone

>

> On Dec 12, 2014, at 11:06 AM, <[nortons@gtlaw.com](mailto:nortons@gtlaw.com)> wrote:

>

>> Actually, if you give us the account information and password, we can carry out the transfer.

>>

>> Shauna Norton

>> Associate

>> Greenberg Traurig, LLP | Suite 400 North

>> 3773 Howard Hughes Parkway | Las Vegas, Nevada 89169 Tel

>> 702.599.8011 | Fax 702.792.9002 [nortons@gtlaw.com](mailto:nortons@gtlaw.com) | [www.gtlaw.com](http://www.gtlaw.com)

>>

>>

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>>

>> PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL

>>

>> -----Original Message-----

>> From: Norton, Shauna (Assoc-LV-IP-Tech)

>> Sent: Friday, December 12, 2014 10:59 AM

>> To: '[ezlease\\_property@yahoo.com](mailto:ezlease_property@yahoo.com)'

>> Cc: Thompson, Lauri S. (Shld-LV-IP-Tech); Burrell, Laraine

>> (Assoc-LV-LT); Ney, Cynthia (Para-LV-LT); Ferrer-Garcia, Claudia Y.

>> (BSTf-LV-IP-Tech)

>> Subject: RE: Registered: Hakkasan - EZ Lease - LEGAL NOTICE

>>

>> To transfer the domain name, you will need to unlock the domain name

>> and change the administrative contact email address to

>> [domainsupport@gtlaw.com](mailto:domainsupport@gtlaw.com). In addition, please note that the court's

>> order (attached) prohibits you from owning ANY domain names containing

>> our client's HAKKASAN trademark. Therefore, if there are any other

>> domain names that you own that contain the HAKKASAN mark in any

>> variation, you are required to transfer those as well. Thanks,

>>

>> Shauna

>>

>> Shauna Norton

>> Associate



>> Greenberg Traurig, LLP | Suite 400 North  
>> 3773 Howard Hughes Parkway | Las Vegas, Nevada 89169 Tel  
>> 702.599.8011 | Fax 702.792.9002 [nortons@gtlaw.com](mailto:nortons@gtlaw.com) | [www.gtlaw.com](http://www.gtlaw.com)  
>>  
>>

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>>  
>> PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL  
>>

>> -----Original Message-----

>> From: [ezlease\\_propertys@yahoo.com](mailto:ezlease_propertys@yahoo.com) [mailto:[ezlease\\_propertys@yahoo.com](mailto:ezlease_propertys@yahoo.com)]  
>> Sent: Friday, December 12, 2014 10:53 AM  
>> To: Norton, Shauna (Assoc-LV-IP-Tech)  
>> Subject: Re: Registered: Hakkasan - EZ Lease - LEGAL NOTICE

>>  
>> We are looking into this now! From our understanding we do not own this domain name! We think the domain company has made a mistake send us your transfer information and we will have them transfer this domain name to you or they will contact you regarding this matter!

>>  
>> Sent from my iPhone  
>>

>> On Dec 12, 2014, at 9:52 AM, <[nortons@gtlaw.com](mailto:nortons@gtlaw.com)> wrote:  
>>

>>> We have identified another infringing domain name containing our client's trademark that is owned by your company. We request that you immediately transfer the domain name to our law firm. If you are unwilling to do this then we will be forced to seek additional relief from the Court which will add at least \$100,000 in statutory damages to our client's judgment. Thank you.

>>>  
>>> Shauna Norton  
>>> Associate

>>> Greenberg Traurig, LLP | Suite 400 North  
>>> 3773 Howard Hughes Parkway | Las Vegas, Nevada 89169 Tel  
>>> 702.599.8011 | Fax 702.792.9002 [nortons@gtlaw.com](mailto:nortons@gtlaw.com) | [www.gtlaw.com](http://www.gtlaw.com)  
>>>  
>>>

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P.A., FLORIDA, USA; WARSAW: OPERATES AS GREENBERG TRAURIG GRZESIAK SP.K.

>>>

>>> PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL

>>>

>>> -----Original Message-----

>>> From: [ezlease\\_propertyys@yahoo.com](mailto:ezlease_propertyys@yahoo.com)

>>> [mailto:[ezlease\\_propertyys@yahoo.com](mailto:ezlease_propertyys@yahoo.com)]

>>> Sent: Thursday, December 11, 2014 9:21 PM

>>> To: Norton, Shauna (Assoc-LV-IP-Tech)

>>> Subject: Re: Registered: Hakkasan - EZ Lease - LEGAL NOTICE

>>>

>>> I or anyone from my company is not appearing in no ones court! We do

>>> not own any domains of this name or have made any financial gain

>>> from this so you are wasting your time and your money filing this!

>>> Good bye

>>>

>>> Sent from my iPhone

>>>

>>> On Dec 11, 2014, at 8:21 PM, <[nortons@gtlaw.com](mailto:nortons@gtlaw.com)> wrote:

>>>

>>>> Sir,

>>>>

>>>> We will not debate the merits of the case with you at this juncture.

>>>> Our client has a federal court judgment against your company and has

>>>> instructed us to proceed with enforcement of its judgement.

>>>> Accordingly, among other things, we will be deposing the person most

>>>> knowledgeable of the company. Please note that failure to appear is

>>>> a direct violation of a court order and may result in your being

>>>> held in contempt of court. Thank you,

>>>>

>>>> Shauna

>>>>

>>>> Sent from my iPhone

>>>>

>>>>

>>>> From:

>>>> [ezlease\\_propertyys@yahoo.com](mailto:ezlease_propertyys@yahoo.com)<mailto:[ezlease\\_propertyys@yahoo.com](mailto:ezlease_propertyys@yahoo.com)>

>>>> [mailto:[ezlease\\_propertyys@yahoo.com](mailto:ezlease_propertyys@yahoo.com)]

>>>> Sent: Thursday, December 11, 2014 4:19 PM

>>>> To: Ney, Cynthia (Para-LV-LT)

>>>> Subject: Re: Registered: Hakkasan - EZ Lease - LEGAL NOTICE

>>>>

>>>> I or our company does not own this domain name!!! Please check your findings!

>>>>

>>>> Sent from my iPhone

>>>>

>>>> On Dec 11, 2014, at 4:07 PM, "[neyc@gtlaw.com](mailto:neyc@gtlaw.com)"<mailto:[neyc@gtlaw.com](mailto:neyc@gtlaw.com)>"

<[neyc@gtlaw.com](mailto:neyc@gtlaw.com)<mailto:[neyc@gtlaw.com](mailto:neyc@gtlaw.com)>> wrote:

>>>> [\*\*\*RPost Registered Email\*\*\*]

>>>>

>>>>

>>>>

>>>> This is a Registered Email® message from [neyc@gtlaw.com](mailto:neyc@gtlaw.com)<mailto:[neyc@gtlaw.com](mailto:neyc@gtlaw.com)>.

>>>>

>>>> \_\_\_\_\_

>>>>

>>>> Attached please find an order issued by the court setting a judgment debtor's examination for January 7, 2014 which requires your attention. Thank you.

>>>>

>>>> Cynthia Ney

>>>> Paralegal

>>>> Greenberg Traurig, LLP | Suite 400 North

>>>> 3773 Howard Hughes Parkway | Las Vegas, Nevada 89169 Tel

>>>> 702.599.8009 [neyc@gtlaw.com](mailto:neyc@gtlaw.com)<mailto:[neyc@gtlaw.com](mailto:neyc@gtlaw.com)> |

>>>> [www.gtlaw.com](http://www.gtlaw.com)<<http://www.gtlaw.com>>

>>>>

>>>> <image001.jpg>

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>>>> \_\_\_\_\_

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>>>>

>>>> [[http://open.rpost.net/5AADFFD7DD94808C4D26DFA8D988A7BFC863CC9E-1\\_C2](http://open.rpost.net/5AADFFD7DD94808C4D26DFA8D988A7BFC863CC9E-1_C2)

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>>>> 6 9658EE25C1EEDB240A7DAEB03AC6176F0933/rpost.gif]

>>>> <026 - order setting exam (EZ Lease) (with attachment).pdf>

>>>> <image001.jpg>

>>>> <Whois mgmhakkasan.pdf>

# **EXHIBIT 1-J**

**Ney, Cynthia (Para-LV-LT)**

---

**From:** Ez Lease Property Management L <ezlease\_propertyts@yahoo.com>  
**Sent:** Monday, December 15, 2014 9:24 PM  
**To:** Norton, Shauna (Assoc-LV-IP-Tech)  
**Cc:** Thompson, Lauri S. (Shld-LV-IP-Tech); Burrell, Laraine (Assoc-LV-LT)  
**Subject:** Re: Registered: Hakkasan - EZ Lease - LEGAL NOTICE

Due to your last email to us, we have contacted our legal team and sent them all of our correspondence that we have had! They have informed us that you have already done some illegal tactics that you should have not done regarding this case!! Just know we are going to fight you on this! You will pay for your illegal tactics that you have done and are doing! The offer that was made to you, was an offer after you people had contacted us with treats!! And it was an offer on domains we did not even own at the time!! So you do not have a case regarding that! But upon our appeal and our counter suit everything will come out!! You people are ruthless and are wrong for what you are doing!! You did not contact us concerning this last domain name MGMHAKKASAN.COM until after you filed a judgement and that is wrong!! But we will let our legal team handle this from now on in!! Your bullying and ruthless tactics will come back to hunt you!! People like you should get what you deserve!! You think you can do whatever you want, and you think because we didn't know the law you could bully us!! But we will see who comes out on top!! Just know that for every dollar we spend you and your clients will spend 10 times as many!! We will not be sending anymore emails to you!! We will see you in court as they say!!;) You are not above the law!!

Ez Lease Property Management LLC  
ezlease\_propertyts@yahoo.com

On Monday, December 15, 2014 4:02 PM, "ezlease\_propertyts@yahoo.com" <ezlease\_propertyts@yahoo.com> wrote:

Well you people are nothing but piece of shit crooks and you can do whatever you want! There was no money ever made from these domain names and you will not get a dime from us! We will shut down our business before we give you something for nothing!! You people will get you're karma for this! So do what you want because that is what kind of crooks you are! But don't let your greed slap you back in the face!! Ever dog has it's day so you do what you have to do! We are not going to spend any unnecessary money to fight a case you don't even have! You got the domains not let your greed get the best of you because we don't know the law, but we have lawyers that do! No good pieces of shit!! Ya I said it!!

Sent from my iPhone

On Dec 15, 2014, at 3:20 PM, <[nortons@gtlaw.com](mailto:nortons@gtlaw.com)> wrote:

Thank you for your cooperation in transferring the <[mgmhakkasan.com](http://mgmhakkasan.com)> domain name. However, we will not withdraw the judgment and we will continue with our efforts to enforce that judgment by all available means, unless and until you provide our client with an acceptable settlement. If you recall, we contacted you multiple times before filing the lawsuit about your unlawful use and registration of the domain names at issue. Unfortunately these communications were unproductive as your response was to offer to sell the domain names to Hakkasan for \$2,000,000. Your actions left our client with no other option than to proceed with litigation. Hakkasan now has a federal judgment against your company. It is clear that you do not understand the law or the legal process in general, therefore, it would be wise for you to retain counsel at this point.

**Shauna Norton**

Associate

Greenberg Traurig, LLP | Suite 400 North  
3773 Howard Hughes Parkway | Las Vegas, Nevada 89169  
Tel 702.599.8011 | Fax 702.792.9002  
[nortons@gtlaw.com](mailto:nortons@gtlaw.com) | [www.gtlaw.com](http://www.gtlaw.com)

<image001.jpg>

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---

**From:** Ez Lease Property Management L [[mailto:ezlease\\_propertyys@yahoo.com](mailto:ezlease_propertyys@yahoo.com)]

**Sent:** Sunday, December 14, 2014 1:37 AM

**To:** Norton, Shauna (Assoc-LV-IP-Tech)

**Subject:** Re: Registered: Hakkasan - EZ Lease - LEGAL NOTICE

In regard to this domain name [MGMHAKKASAN.COM](http://MGMHAKKASAN.COM) we have contacted the domain company network solutions for the transfer of this domain name to you!! But we want you to withdrawal you're judgement upon transfer which is completely false!! This domain was not ever purchased to infringed or bought to sell back to MGM OR HAKKASAN they were only purchase to promote the new night clubs on a website that we no longer have that were coming to Las Vegas!! You do not have any proof of cyber squatting or any emails to either company asking for the purchase of these domain names by your company!! The domain name [MGMHAKKASAN.COM](http://MGMHAKKASAN.COM) should have expired from us April of 2014 but network solutions took it upon themselves to renew this domain main name without our knowledge! We did not even know that we were still the owners of this domain name until now! This domain name has not been advertised in any way by us and we have not done any infringing of any kind regarding any of your domain names!! There has been no monetary gain or any confusion caused from any of these domain names so you're judgement and demands are completely false!!

If any demands are falsely awarded to you we will contact our lawyers and sue you for defamation! We are closing the account with the company network solutions that this domain name belongs to and are hosting, so we need your domain hosting information so we can start the transfer of this domain name!! There are no other domain names that belongs to use regarding this name!

We await you information to start transfer!!

Ez Lease Property Management LLC

[ezlease\\_propertyys@yahoo.com](mailto:ezlease_propertyys@yahoo.com)

On Friday, December 12, 2014 11:44 AM, "[ezlease\\_propertyys@yahoo.com](mailto:ezlease_propertyys@yahoo.com)"

<[ezlease\\_propertyys@yahoo.com](mailto:ezlease_propertyys@yahoo.com)> wrote:

This domain shouldn't have been renewed! It appears that domain company took upon itself to renew this domain! We will transfer! We didn't even know we still owned it so contacting us first will have save you and the company you represent alot of time and money! We will see what it takes to make transfer!

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> Shauna Norton

> Associate

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COUNTY · ORLANDO · PALM BEACH

COUNTY · PHILADELPHIA · PHOENIX · SACRAMENTO · SAN

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AS GREENBERG TRAUIG GRZESIAK SP.K.

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> PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL

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> From: [ezlease\\_propertys@yahoo.com](mailto:ezlease_propertys@yahoo.com) [mailto:[ezlease\\_propertys@yahoo.com](mailto:ezlease_propertys@yahoo.com)]

> Sent: Friday, December 12, 2014 11:26 AM

> To: Norton, Shauna (Assoc-LV-IP-Tech)

> Subject: Re: Registered: Hakkasan - EZ Lease - LEGAL NOTICE

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>> -----Original Message-----

>> From: Norton, Shauna (Assoc-LV-IP-Tech)

>> Sent: Friday, December 12, 2014 10:59 AM

>> To: '[ezlease\\_property@yahoo.com](mailto:ezlease_property@yahoo.com)'

>> Cc: Thompson, Lauri S. (Shld-LV-IP-Tech); Burrell, Laraine

>> (Assoc-LV-LT); Ney, Cynthia (Para-LV-LT); Ferrer-Garcia, Claudia Y.

>> (BSTf-LV-IP-Tech)

>> Subject: RE: Registered: Hakkasan - EZ Lease - LEGAL NOTICE

>>

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>> our client's HAKKASAN trademark. Therefore, if there are any other

>> domain names that you own that contain the HAKKASAN mark in any

>> variation, you are required to transfer those as well. Thanks,

>>

>> Shauna

>>

>> Shauna Norton

>> Associate

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>>

>> PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL

>>

>> -----Original Message-----

>> From: [ezlease\\_property@yahoo.com](mailto:ezlease_property@yahoo.com) [mailto:[ezlease\\_property@yahoo.com](mailto:ezlease_property@yahoo.com)]

>> Sent: Friday, December 12, 2014 10:53 AM

>> To: Norton, Shauna (Assoc-LV-IP-Tech)

>> Subject: Re: Registered: Hakkasan - EZ Lease - LEGAL NOTICE

>>

>> We are looking into this now! From our understanding we do not own this domain name! We think the domain company has made a mistake send us your transfer information and we will have them transfer this domain name to you or they will contact you regarding this matter!

>>

>> Sent from my iPhone

>>

>> On Dec 12, 2014, at 9:52 AM, <[nortons@gtlaw.com](mailto:nortons@gtlaw.com)> wrote:

>>

>>> We have identified another infringing domain name containing our client's trademark that is owned by your company. We request that you immediately transfer the domain name to our law firm. If you are unwilling to do this then we will be forced to seek additional relief from the Court which will add at least \$100,000 in statutory damages to our client's judgment. Thank you.

>>>

>>> Shauna Norton

>>> Associate

>>> Greenberg Traurig, LLP | Suite 400 North

>>> 3773 Howard Hughes Parkway | Las Vegas, Nevada 89169 Tel

>>> 702.599.8011 | Fax 702.792.9002 [nortons@gtlaw.com](mailto:nortons@gtlaw.com) | [www.gtlaw.com](http://www.gtlaw.com)

>>>

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>>> From: [ezlease\\_propertyys@yahoo.com](mailto:ezlease_propertyys@yahoo.com)

>>> [mailto:[ezlease\\_propertyys@yahoo.com](mailto:ezlease_propertyys@yahoo.com)]

>>> Sent: Thursday, December 11, 2014 9:21 PM

>>> To: Norton, Shauna (Assoc-LV-IP-Tech)

>>> Subject: Re: Registered: Hakkasan - EZ Lease - LEGAL NOTICE

>>>

>>> I or anyone from my company is not appearing in no ones court! We do

>>> not own any domains of this name or have made any financial gain

>>> from this so you are wasting your time and your money filing this!

>>> Good bye

>>>

>>> Sent from my iPhone

>>>

>>> On Dec 11, 2014, at 8:21 PM, <[nortons@gtlaw.com](mailto:nortons@gtlaw.com)> wrote:

>>>

>>>> Sir,

>>>>

>>>> We will not debate the merits of the case with you at this juncture.

>>>> Our client has a federal court judgment against your company and has

>>>> instructed us to proceed with enforcement of its judgement.

>>>> Accordingly, among other things, we will be deposing the person most

>>>> knowledgeable of the company. Please note that failure to appear is

>>>> a direct violation of a court order and may result in your being

>>>> held in contempt of court. Thank you,

>>>>

>>>> Shauna

>>>>

>>>> Sent from my iPhone

>>>>

>>>>

>>>> From:

>>>> [ezlease\\_propertyys@yahoo.com](mailto:ezlease_propertyys@yahoo.com)<mailto:[ezlease\\_propertyys@yahoo.com](mailto:ezlease_propertyys@yahoo.com)>

>>>> [mailto:[ezlease\\_propertyys@yahoo.com](mailto:ezlease_propertyys@yahoo.com)]

>>>> Sent: Thursday, December 11, 2014 4:19 PM

>>>> To: Ney, Cynthia (Para-LV-LT)

>>>> Subject: Re: Registered: Hakkasan - EZ Lease - LEGAL NOTICE

>>>>

>>>> I or our company does not own this domain name!!! Please check your findings!

>>>>

>>>> Sent from my iPhone

>>>>

>>>> On Dec 11, 2014, at 4:07 PM, "[neyc@gtlaw.com](mailto:neyc@gtlaw.com)"<mailto:[neyc@gtlaw.com](mailto:neyc@gtlaw.com)>"  
<[neyc@gtlaw.com](mailto:neyc@gtlaw.com)<mailto:[neyc@gtlaw.com](mailto:neyc@gtlaw.com)>> wrote:

>>>> [\*\*\*RPost Registered Email\*\*\*]

>>>>

>>>>

>>>>

>>>> This is a Registered Email® message from  
[neyc@gtlaw.com](mailto:neyc@gtlaw.com)<mailto:[neyc@gtlaw.com](mailto:neyc@gtlaw.com)>.

>>>>

>>>> \_\_\_\_\_

>>>>

>>>> Attached please find an order issued by the court setting a judgment debtor's  
examination for January 7, 2014 which requires your attention. Thank you.

>>>>

>>>> Cynthia Ney

>>>> Paralegal

>>>> Greenberg Traurig, LLP | Suite 400 North

>>>> 3773 Howard Hughes Parkway | Las Vegas, Nevada 89169 Tel

>>>> 702.599.8009 [neyc@gtlaw.com](mailto:neyc@gtlaw.com)<mailto:[neyc@gtlaw.com](mailto:neyc@gtlaw.com)> |

>>>> [www.gtlaw.com](http://www.gtlaw.com)<<http://www.gtlaw.com/>>

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>>>> <image001.jpg>

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this email, please delete it, notify us immediately at  
[postmaster@gtlaw.com](mailto:postmaster@gtlaw.com)<mailto:[postmaster@gtlaw.com](mailto:postmaster@gtlaw.com)>, and do not use or disseminate  
such information.

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>>>> Click here<<https://rmail.rpost.com/RMAIL/autologin.aspx?rr=40DA25FF>> to send  
a Registered Email® message to anyone.

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>>>> [[http://open.rpost.net/5AADFFD7DD94808C4D26DFA8D988A7BFC863CC9E-  
1\\_C2](http://open.rpost.net/5AADFFD7DD94808C4D26DFA8D988A7BFC863CC9E-1_C2)

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>>>> 6 9658EE25C1EEDB240A7DAEB03AC6176F0933/rpost.gif]

>>>> <026 - order setting exam (EZ Lease) (with attachment).pdf>

>>>> <image001.jpg>

>>> <Whois mgmhakkasan.pdf>

# **EXHIBIT 1-K**

**Ney, Cynthia (Para-LV-LT)**

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**From:** ezlease\_propertys@yahoo.com  
**Sent:** Monday, December 15, 2014 4:02 PM  
**To:** Norton, Shauna (Assoc-LV-IP-Tech)  
**Cc:** Thompson, Lauri S. (Shld-LV-IP-Tech); Burrell, Laraine (Assoc-LV-LT)  
**Subject:** Re: Registered: Hakkasan - EZ Lease - LEGAL NOTICE

Well you people are nothing but piece of shit crooks and you can do whatever you want! There was no money ever made from these domain names and you will not get a dime from us! We will shut down our business before we give you something for nothing!! You people will get you're karma for this! So do what you want because that is what kind of crooks you are! But don't let your greed slap you back in the face!! Ever dog has it's day so you do what you have to do! We are not going to spend any unnecessary money to fight a case you don't even have! You got the domains not let your greed get the best of you because we don't know the law, but we have lawyers that do! No good pieces of shit!! Ya I said it!!

Sent from my iPhone

On Dec 15, 2014, at 3:20 PM, <[nortons@gtlaw.com](mailto:nortons@gtlaw.com)> wrote:

Thank you for your cooperation in transferring the <[mgmhakkasan.com](http://mgmhakkasan.com)> domain name. However, we will not withdraw the judgment and we will continue with our efforts to enforce that judgment by all available means, unless and until you provide our client with an acceptable settlement. If you recall, we contacted you multiple times before filing the lawsuit about your unlawful use and registration of the domain names at issue. Unfortunately these communications were unproductive as your response was to offer to sell the domain names to Hakkasan for \$2,000,000. Your actions left our client with no other option than to proceed with litigation. Hakkasan now has a federal judgment against your company. It is clear that you do not understand the law or the legal process in general, therefore, it would be wise for you to retain counsel at this point.

**Shauna Norton**  
Associate  
Greenberg Traurig, LLP | Suite 400 North  
3773 Howard Hughes Parkway | Las Vegas, Nevada 89169  
Tel 702.599.8011 | Fax 702.792.9002

[nortons@gtlaw.com](mailto:nortons@gtlaw.com) | [www.gtlaw.com](http://www.gtlaw.com)

<image001.jpg>

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**From:** Ez Lease Property Management L [mailto:[ezlease\\_propertyys@yahoo.com](mailto:ezlease_propertyys@yahoo.com)]  
**Sent:** Sunday, December 14, 2014 1:37 AM  
**To:** Norton, Shauna (Assoc-LV-IP-Tech)  
**Subject:** Re: Registered: Hakkasan - EZ Lease - LEGAL NOTICE

In regard to this domain name [MGMHAKKASAN.COM](http://MGMHAKKASAN.COM) we have contacted the domain company network solutions for the transfer of this domain name to you!! But we want you to withdrawal you're judgement upon transfer which is completely false!! This domain was not ever purchased to infringed or bought to sell back to MGM OR HAKKASAN they were only purchase to promote the new night clubs on a website that we no longer have that were coming to Las Vegas!! You do not have any proof of cyber squatting or any emails to either company asking for the purchase of these domain names by your company!! The domain name [MGMHAKKASAN.COM](http://MGMHAKKASAN.COM) should have expired from us April of 2014 but network solutions took it upon themselves to renew this domain main name without our knowledge! We did not even know that we were still the owners of this domain name until now! This domain name has not been advertised in any way by us and we have not done any infringing of any kind regarding any of your domain names!! There has been no monetary gain or any confusion caused from any of these domain names so you're judgement and demands are completely false!!

If any demands are falsely awarded to you we will contact our lawyers and sue you for defamation! We are closing the account with the company network solutions that this domain name belongs to and are hosting, so we need your domain hosting information so we can start the transfer of this domain name!! There are no other domain names that belongs to use regarding this name!

We await you information to start transfer!!

Ez Lease Property Management LLC  
[ezlease\\_propertyys@yahoo.com](mailto:ezlease_propertyys@yahoo.com)

On Friday, December 12, 2014 11:44 AM, "[ezlease\\_propertyys@yahoo.com](mailto:ezlease_propertyys@yahoo.com)" <[ezlease\\_propertyys@yahoo.com](mailto:ezlease_propertyys@yahoo.com)> wrote:

This domain shouldn't have been renewed! It appears that domain company took upon itself to renew this domain! We will transfer! We didn't even know we still owned it so contacting us first will have save you and the company you represent alot of time and money! We will see what it takes to make transfer!

Sent from my iPhone

On Dec 12, 2014, at 11:33 AM, <[nortons@gtlaw.com](mailto:nortons@gtlaw.com)> wrote:

> Our client will not pay you for a domain name that you illegally registered in the first place and that you continued to own in violation of the court's order.

>

> Shauna Norton

> Associate

> Greenberg Traurig, LLP | Suite 400 North

> 3773 Howard Hughes Parkway | Las Vegas, Nevada 89169

> Tel 702.599.8011 | Fax 702.792.9002

> [nortons@gtlaw.com](mailto:nortons@gtlaw.com) | [www.gtlaw.com](http://www.gtlaw.com)

>

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>

> PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL

>

> -----Original Message-----

> From: [ezlease\\_propertys@yahoo.com](mailto:ezlease_propertys@yahoo.com) [mailto:[ezlease\\_propertys@yahoo.com](mailto:ezlease_propertys@yahoo.com)]

> Sent: Friday, December 12, 2014 11:26 AM

> To: Norton, Shauna (Assoc-LV-IP-Tech)

> Subject: Re: Registered: Hakkasan - EZ Lease - LEGAL NOTICE

>

> Ok we have received information regarding this domain! Are you will to pay the price that was paid for this domain?

>

> Sent from my iPhone

>

> On Dec 12, 2014, at 11:06 AM, <[nortons@gtlaw.com](mailto:nortons@gtlaw.com)> wrote:

>

>> Actually, if you give us the account information and password, we can carry out the transfer.

>>

>> Shauna Norton

>> Associate

>> Greenberg Traurig, LLP | Suite 400 North

>> 3773 Howard Hughes Parkway | Las Vegas, Nevada 89169 Tel

>> 702.599.8011 | Fax 702.792.9002 [nortons@gtlaw.com](mailto:nortons@gtlaw.com) | [www.gtlaw.com](http://www.gtlaw.com)

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>> -----Original Message-----

>> From: Norton, Shauna (Assoc-LV-IP-Tech)

>> Sent: Friday, December 12, 2014 10:59 AM

>> To: '[ezlease\\_property@yahoo.com](mailto:ezlease_property@yahoo.com)'

>> Cc: Thompson, Lauri S. (Shld-LV-IP-Tech); Burrell, Laraine

>> (Assoc-LV-LT); Ney, Cynthia (Para-LV-LT); Ferrer-Garcia, Claudia Y.

>> (BSTf-LV-IP-Tech)

>> Subject: RE: Registered: Hakkasan - EZ Lease - LEGAL NOTICE

>>

>> To transfer the domain name, you will need to unlock the domain name

>> and change the administrative contact email address to

>> [domainsupport@gtlaw.com](mailto:domainsupport@gtlaw.com). In addition, please note that the court's

>> order (attached) prohibits you from owning ANY domain names containing

>> our client's HAKKASAN trademark. Therefore, if there are any other

>> domain names that you own that contain the HAKKASAN mark in any

>> variation, you are required to transfer those as well. Thanks,

>>

>> Shauna

>>

>> Shauna Norton

>> Associate

>> Greenberg Traurig, LLP | Suite 400 North

>> 3773 Howard Hughes Parkway | Las Vegas, Nevada 89169 Tel

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>>> We have identified another infringing domain name containing our client's  
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seek additional relief from the Court which will add at least \$100,000 in statutory  
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>>> not own any domains of this name or have made any financial gain

>>> from this so you are wasting your time and your money filing this!

>>> Good bye

>>>

>>> Sent from my iPhone

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<[neyc@gtlaw.com](mailto:neyc@gtlaw.com)<mailto:[neyc@gtlaw.com](mailto:neyc@gtlaw.com)>> wrote:

>>>> [\*\*\*RPost Registered Email\*\*\*]

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[neyc@gtlaw.com](mailto:neyc@gtlaw.com)<mailto:[neyc@gtlaw.com](mailto:neyc@gtlaw.com)>.

>>>>

>>>> \_\_\_\_\_

>>>>

>>>> Attached please find an order issued by the court setting a judgment debtor's examination for January 7, 2014 which requires your attention. Thank you.

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>>>> Cynthia Ney

>>>> Paralegal

>>>> Greenberg Traurig, LLP | Suite 400 North

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>>>> [www.gtlaw.com](http://www.gtlaw.com)<<http://www.gtlaw.com/>>

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[postmaster@gtlaw.com](mailto:postmaster@gtlaw.com)<mailto:[postmaster@gtlaw.com](mailto:postmaster@gtlaw.com)>, and do not use or disseminate such information.

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>>>>

>>>> [[http://open.rpost.net/5AADFFD7DD94808C4D26DFA8D988A7BFC863CC9E-1\\_C2](http://open.rpost.net/5AADFFD7DD94808C4D26DFA8D988A7BFC863CC9E-1_C2)

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>>>> 6 9658EE25C1EEDB240A7DAEB03AC6176F0933/rpost.gif]

>>>> <026 - order setting exam (EZ Lease) (with attachment).pdf>

>>>> <image001.jpg>

>>> <Whois mgmhakkasan.pdf>